

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

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|---------------------------------|---|--------------------------|
| RICHARD IRVING BECKMAN |) | |
| AND KARI ANN BECKMAN, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | CIVIL ACTION NO. |
| v. |) | 1:23-CV-06000-SEG |
| |) | |
| REGINA CAELI, INC. a/k/a |) | |
| REGINA CAELI ACADEMY, |) | |
| |) | |
| Defendant. |) | |

JOINT MOTION TO EXTEND DISCOVERY AND
AMEND SCHEDULING ORDER

Pursuant to Federal Rules of Civil Procedure 6(b), 16(b)(4) and L.R. 26.2(B), Plaintiffs Richard Irving Beckman and Kari Ann Beckman (together, the “Beckmans” or “Plaintiffs”) and Defendant Regina Caeli, Inc. a/k/a Regina Caeli Academy (“RCA” or “Defendant”) jointly move this Court to extend discovery and enter a Second Amended Scheduling Order. Good cause exists for this extension for the following reasons:

1. Plaintiffs notified Defendant of their intent to substitute their counsel on April 10, 2025. [Doc. 112-1].
2. Plaintiffs filed their Amended Notice of Substitution of Counsel on April 25, 2025. [Doc. 116].

3. Upon receipt of Plaintiffs' notice of intent to substitute counsel, Defendant moved to extend discovery. [Doc. 112].

4. Shortly thereafter, Plaintiffs filed their Motion for Leave to File Third Amended Complaint ("Motion for Leave"). [Doc. 122]. Of note, Plaintiffs sought to dismiss their negligent misrepresentation claim and Rich Beckman's Fair Labor Standards Act ("FLSA") claim, as well as request attorneys' fees under O.C.G.A. § 13-6-11. Defendant timely filed a Response in Opposition to Plaintiffs' Motion for Leave to the extent it sought to add an O.C.G.A. § 13-6-11 claim. [Doc. 125]. Plaintiffs' Motion for Leave is fully briefed but remains pending.

5. On June 20, 2025, the Court granted Defendant's Motion to Extend Discovery (in part), and extended fact discovery by and until September 5, 2025. [Doc. 123].

6. Over the past few months, the Parties have diligently pursued discovery. The Parties have produced additional documents, exchanged written conferrals, supplemented written responses, and have been working to schedule depositions.

7. However, the Parties require additional time to schedule depositions given Plaintiffs and Defendant's 30(b)(6) representative must all travel into this forum to conduct depositions.

8. Moreover, because Plaintiffs' Motion for Leave remains pending, the Parties' deposition preparation would benefit from a ruling as to whether some issues will be moot such that they need not be addressed in depositions at all (Plaintiffs' FLSA and negligent misrepresentation claims if dismissed) or whether additional issues must be encompassed (Plaintiffs' request for attorney's fees pursuant to O.C.G.A. § 13-6-11). The Parties prefer to avoid addressing issues in depositions that may no longer be relevant after this Court rules upon Plaintiffs' Motion for Leave.

9. For these reasons, and to meet the discovery needs of the case, good cause exists for extending discovery and amending the Scheduling Order.

10. Therefore, the Parties jointly request that fact discovery be extended by and until October 10, 2025 to accommodate the Parties' depositions, and to provide this Court with additional time to rule upon Plaintiffs' Motion for Leave, and that all deadlines be adjusted commensurately.

11. For the reasons laid out herein, the Court should grant this Motion and enter the Parties' Joint Proposed Second Amended Scheduling Order. A proposed Order is attached hereto as Exhibit A.

Respectfully submitted this 19th day of August 2025.

HASSON LAW GROUP, LLP

/s/ J. Tanner Lusk (signed by S. Press
w/ express permission)

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned counsel certifies that the pleading has been prepared in Times New Roman, 14-point type, which is of the font selections approved by the Court in Local Rule 5.1(B).

Respectfully submitted this 19th day of August 2025.

**BAKER, DONELSON, BEARMAN
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*Counsel for Defendant Regina Caeli, Inc.,
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CERTIFICATE OF SERVICE

This will certify service of a copy of the foregoing was filed and served via the CM/ECF online filing system with the U.S. District Court for the Northern District of Georgia, which will automatically send email notification to all counsel of record.

Respectfully submitted this 19th day of August 2025.

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

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